



ARKANSAS
Department of Environmental Quality

September 12, 2008

AMEC Geomatrix, Inc.
Attn: Kelly Beck
Project Manager
5725 Highway 290 West, Suite 200-B
Austin, Texas 78735-8722

RE: Facility Investigation (FI) Workplan Supplement No. 3 – Interim Measure of Waste Removal from the Drum Vault for Cedar Chemical Company (August 28, 2008)
EPA ID Number ARD990660649; AFIN 54-00068

Dear Ms. Beck:

The Arkansas Department of Environmental Quality – Hazardous Waste Division (ADEQ) has reviewed the Facility Investigation (FI) Workplan Supplement No. 3 regarding the interim measure of waste removal from the drum vault.

ADEQ understands the concerns that the drum vault contents are a continuing source and if this is true the contents should be removed in their entirety as soon as possible. ADEQ also agrees these interim measures could reduce the risk and potential of future sources of contamination to the groundwater underlying the Cedar site. However, ADEQ does not concur with the approach outlined in the August 28, 2008 Supplement No. 3 including the additional details provided in the September 8, 2008 meeting between the Cedar Potential Responsible Party (PRP) group, Amec Geomatrix, and ADEQ.

As mentioned within Supplement No. 3, there are some drums that are believed to be intact within the drum vault. These drums should be characterized separate from the water saturated sandy backfill material discovered during the most recent exploration activities conducted at the drum vault location. Solidification is a form of treatment and therefore, appropriate measures should be taken to ensure all applicable local, state, and/or federal regulations are followed. Characterization is important in determining the appropriate disposal options for the waste removed from the drum vault. The generator has a responsibility to collect enough analytical information to determine all appropriate characteristic and/or listed hazardous waste codes that apply to the contents of the drum vault. Lastly, the Supplement No. 3 lacks representation of any confirmation sampling once the contents of the drum vault have been removed and the concrete walls/bottom have been pressure washed and cleaned with a phosphate-based detergent.

ADEQ agrees that removal of the drum vault contents would be a prudent effort and acknowledge implementation of interim measures at this time could greatly decrease the role of the drum vault as a source of soil and groundwater contamination in the central plant area. However, the interim measures must be conducted in accordance with standard interim measure practices and the regulations. It is for the reasons outlined in this correspondence that ADEQ

does not approve the August 28, 2008 Supplement No. 3. Based on Amec Geomatrix's conclusions and recommendations, ADEQ strongly encourages the PRP Group to provide an acceptable plan as soon as possible so that removal of the drum vault may commence.

If you have any further questions or need additional information, please feel free to contact Tammie J. Hynum of my staff at (501) 682-0856 or hynum@adeq.state.ar.us or myself at (501) 682-0831 or at benefield@adeq.state.ar.us.

Sincerely,



J. Ryan Benefield, P.E.
Hazardous Waste Division Chief

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